

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

DANIEL DEAN STEBBINS,

Plaintiff,

v.

Case No:  
Judge  
Magistrate

NEW HOPE YOUTH OPPORTUNITY, LLC,  
MARCI CANALIS (FA),  
MARY LITTLE (AFA),  
SHAWN McDANIEL (PPS),

Defendants.

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Daniel Dean Stebbins  
In Pro Per  
8670 N. Union Road  
St. Louis, MI 48880  
616.902.3753

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John J. Gillooly (P41948)  
GARAN LUCOW MILLER, P.C.  
Attorney for Defendants  
1155 Brewery Park Blvd., Suite 200  
Detroit, MI 48207-2641  
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[jjgillooly@garanlucow.com](mailto:jjgillooly@garanlucow.com)

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**NOTICE FOR REMOVAL OF CAUSE TO  
UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

TO: Daniel Dean Stebbins

1. On November 21, 2024, Plaintiff filed a Complaint in the Circuit Court for the County of Isabella, State of Michigan, in which NEW HOPE YOUTH OPPORTUNITY, LLC, MARCI CANALIS, MARY LITTLE AND SHAWN McDANIEL are the named Defendants.

3. Plaintiff, DANIEL DEAN STEBBINS, is described by Plaintiff as a citizen and resident of the State of Michigan.

4. Plaintiff herein seeks recovery from Defendants, NEW HOPE YOUTH OPPORTUNITY, LLC, MARCI CANALIS, MARY LITTLE AND SHAWN McDANIEL, alleging violations of the Americans with Disabilities Act, 42 U.S.C. § 12101, please see page 2 of 2 of Plaintiff's Complaint.

5. This Court has original jurisdiction over Plaintiff's claims inasmuch as those claims arise under the Constitution and laws of the United States, which provide for equal rights, and this action is removable to this Court pursuant to 28 U.S.C. §1331. The entire cause is removable, including claims arising under Michigan law, pursuant to 28 U.S.C. §1441(a).

6. That this Notice for Removal is hereby filed with this Court within thirty (30) days after receipt by Defendants, NEW HOPE YOUTH OPPORTUNITY, LLC, MARCI CANALIS, MARY LITTLE AND SHAWN McDANIEL, of a copy of the Complaint, which sets forth a claim for relief upon which this action is based, as required by 28 U.S.C. § 1446(b), having been received by Defendants, on December 18, 2024.

7. That written notice of the filing of this Notice for Removal, has been given to the adverse party as required by law and a copy of the Notice for Removal has been filed with the Clerk of the Circuit Court for the County of Isabella, State of Michigan.

8. Attached is a copy of the Complaint served upon Defendants, NEW HOPE YOUTH OPPORTUNITY, LLC, MARCI CANALIS, MARY LITTLE AND SHAWN McDANIEL, in this cause.

WHEREFORE, Defendants, NEW HOPE YOUTH OPPORTUNITY, LLC, MARCI CANALIS, MARY LITTLE AND SHAWN McDANIEL, respectfully request that this Honorable Court enter an Order removing this cause from the Circuit Court for the County

of Isabella, State of Michigan to the United States District Court, Western District of Michigan, Southern Division.

Respectfully submitted:

GARAN LUCOW MILLER, P.C.

/s/John J. Gillooly

JOHN J. GILLOOLY (P41948)

Attorneys for Defendants

1155 Brewery Park Blvd., Suite 200

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Dated: January 7, 2025

6888549

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
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**AFFIDAVIT**

STATE OF MICHIGAN) ) ss.  
COUNTY OF WAYNE )

JOHN J. GILLOOLY, being first duly sworn, deposes and says, that he is associated with the law firm of GARAN LUCOW MILLER, P.C. and that he has been charged with the defense and representation of NEW HOPE YOUTH OPPORTUNITY, LLC, MARCI CANALIS, MARY LITTLE AND SHAWN McDANIEL, Defendants, herein; that in such capacity he has prepared the foregoing Notice for Removal of Cause to the United States District Court, Western District of Michigan, Southern Division, that the matters set forth in said Notice are true except as to those matters stated herein to be

upon his information and belief as to which matters he is informed and believes same to be true.

Further deponent sayeth not.

/s/John J. Gillooly  
JOHN J. GILLOOLY (P41948)

Subscribed and sworn to before me  
on the 7<sup>th</sup> day of January, 2025.

/s/Dena Marie Shealy  
Dena Marie Shealy, Notary Public  
County of Macomb, State of Michigan  
My Commission Expires: 02/28/2026  
Acting in the County of Wayne

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**PROOF OF SERVICE**

STATE OF MICHIGAN)

) ss.

COUNTY OF WAYNE )

DENA MARIE SHEALY, being first duly sworn, deposes and says that she is employed by GARAN LUCOW MILLER, P.C., and that on the 7<sup>th</sup> day of January, 2025, she caused to be served a true copy of **NOTICE FOR REMOVAL, AFFIDAVIT and PROOF OF SERVICE** upon the following:

Daniel Dean Stebbins  
In Pro Per  
8670 N. Union Road  
St. Louis, MI 48880

Assignment Clerk  
ISABELLA COUNTY TRIAL COURT  
300 N. Main Street  
Mount Pleasant, MI 48858

by enclosing same in a pre-addressed, pre-stamped envelope and depositing same in the United States Mail.

/s/Dena Marie Shealy